

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)  
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In Re:

KEITH CASEY

Debtors.

Chapter 13

Case No.: 13-30931-MBK

Judge: Michael B. Kaplan

**CERTIFICATION IN OPPOSITION TO MOTION TO REOPEN CASE AND  
MOTION FOR RELIEF *NUNC PRO TUNC***

Keith Casey, of full age, hereby certifies as follows:

1. I am the Debtor in the above-referenced matter, and I make this certification in opposition to the motion by The City of Trenton to re-open my previous bankruptcy case and to obtain relief from the stay *nunc pro tunc*.

2. The movant admits that it was a violation of the automatic stay provisions of 11 U.S.C. §362 to conduct a tax sale during the pendency of my previous bankruptcy. The property subject to the tax sale is a property with only 3 garages on it (no house), from which I derive some rental income.

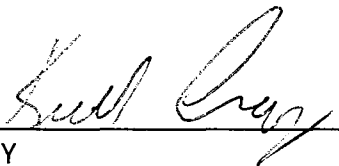
3. Since the dismissal of my case one year ago, I have been looking at other options for my restaurant located at 1855 North Olden Avenue, Ewing, New Jersey. I have listed the restaurant and property for sale with a realtor. There is a potential buyer interested in purchasing the property, and I hope to have a contract in the near future.

4. I am in the process of preparing another bankruptcy petition, with the intention of filing it next week. This is necessary to address the rest of my financial situation at this point, such as the pending foreclosure on the real estate for the North Olden Avenue property.

5. The re-opening of my previous bankruptcy would preclude me from filing a new one. This would seriously prejudice me. I need to file a new Chapter 13 in order to straighten out my financial situation and should not be deprived from doing so because of a previous violation of the automatic stay by one of my creditors. That creditor will be addressed in my new bankruptcy.

6. For these reasons, I respectfully request that both the motion to reopen my previous bankruptcy and the motion for relief *nunc pro tunc*, be denied.

I certify that the foregoing statements made by me are true to the best of my knowledge. I understand that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
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KEITH CASEY

DATED: 8/7/19